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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

TECHNOLOGY PROPERTIES LIMITED
 LLC and MCM PORTFOLIO LLC,

Plaintiffs,

v.

CANON, INC., et al.,

Defendants.

Case No. 4:14-cv-03640-CW

**DECLARATION OF ADEEL HAROON
 IN SUPPORT OF DEFENDANTS'
 MOTION FOR LEAVE TO AMEND
 INVALIDITY CONTENTIONS**

1 TECHNOLOGY PROPERTIES LIMITED
2 LLC and MCM PORTFOLIO LLC,

3 Plaintiffs,

4 v.

5 HEWLETT-PACKARD COMPANY,

6 Defendant.
7

Case No. 4:14-cv-03643-CW

**DECLARATION OF ADEEL HAROON
IN SUPPORT OF DEFENDANTS'
MOTION FOR LEAVE TO AMEND
INVALIDITY CONTENTIONS**

8 TECHNOLOGY PROPERTIES LIMITED
9 LLC and MCM PORTFOLIO LLC,

10 Plaintiffs,

11 v.

12 NEWEGG INC., et al.,

13 Defendants.
14

Case No. 4:14-cv-03645-CW

**DECLARATION OF ADEEL HAROON
IN SUPPORT OF DEFENDANTS'
MOTION FOR LEAVE TO AMEND
INVALIDITY CONTENTIONS**

15 TECHNOLOGY PROPERTIES LIMITED
16 LLC and MCM PORTFOLIO LLC,

17 Plaintiffs,

18 v.

19 SEIKO EPSON CORPORATION., et al.,

20 Defendants.
21

Case No. 4:14-cv-03646-CW

**DECLARATION OF ADEEL HAROON
IN SUPPORT OF DEFENDANTS'
MOTION FOR LEAVE TO AMEND
INVALIDITY CONTENTIONS**

1 I, Adeel Haroon, declare and state as follows:

2 1. I am an attorney at Kenyon & Kenyon LLP, counsel of record for Defendant Hewlett-
3 Packard Company ("HP").

4 2. I submit this declaration in support of Defendants' Administrative Defendants' Motion for
5 Leave to Amend Invalidity Contentions ("Motion"), filed concurrently herewith. I have personal
6 knowledge of the statements set forth in this declaration and, if called as a witness, could and
7 would do so competently.

8 3. The above-referenced matters were transferred to this Court from the Eastern District of
9 Texas in August 2014.

10 4. In November 2014, the Court granted the parties request for an early claim construction
11 hearing. The claim construction hearing was held in June 2015, and the Court issued its order
12 construing disputed terms on September 18, 2015.

13 5. On January 16, 2015, Defendants served their initial joint invalidity contentions. The
14 invalidity contentions included cites to over 30 prior art references.

15 6. On June 9, 2015, HP served a subpoena on SanDisk seeking documents and a deposition
16 relating to prior art for Defendants' invalidity defenses.

17 7. In response to the subpoena, SanDisk produced documents on a rolling basis between July
18 10 and October 1, 2015. HP promptly served documents received from SanDisk on the parties,
19 including the Plaintiffs.

20 8. The deposition was originally noticed for July 23, but was rescheduled twice—first to
21 August 10 and then October 7—at Plaintiffs' counsel's request to accommodate their schedule.

22 9. SanDisk's document productions included the following documents: the SD Specification
23 version 0.9 (Exhibit B), the SD Simplified Specification version 0.9 (Exhibit C), and a print-out
24 showing sales of a SanDisk SDDR-33 product (Exhibit D).

25 10. On October 7, 2015, HP deposed SanDisk's Rule 30(b)(6) witness, who provided
26 testimony concerning the documents produced by SanDisk.

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28

11. Plaintiffs' counsel attended the deposition of SanDisk and cross-examined SanDisk's witness on the significance of SanDisk's documents for over 2 1/2 hours.

12. Defendants were not aware of the SD Specification version 0.9, the SD Simplified Specification version 0.9, or the SanDisk SDDR-33 product when they served their initial joint invalidity contentions in January 2015.

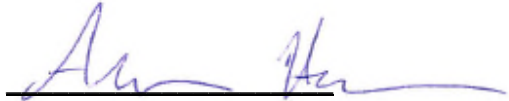
13. After completing the deposition of SanDisk, Defendants notified Plaintiffs of their intention to amend their invalidity contentions based on the three newly-discovered prior art references and the Court's claim constructions. Thereafter, Defendants provided Plaintiffs with a redline draft of their proposed amended invalidity contentions and new invalidity claims charts for the three prior art references.

14. The parties met and conferred regarding Defendant's proposed amended invalidity contentions. Plaintiffs stated that they reserve the right to oppose the instant motion.

15. The Court has not yet issued a scheduling order that sets forth deadlines for the close of fact and expert discovery.

16. The only deposition taken so far in this action has been that of SanDisk.

I declare under penalty of perjury declare that the foregoing is true and correct and that this Declaration was executed this 27th day of October, 2015 in Washington, D.C.


Adeel Haroon

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served on all counsel for all parties of record on October 28, 2015 via the Court's CM/ECF system.

/s/ Gordon M. Fauth